

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

## **PLAINTIFFS' MOTION FOR ENTRY OF CONSENT JUDGMENT**

Plaintiffs, Central States, Southeast and Southwest Areas Pension Fund and Arthur H. Bunte, Jr., as trustee, by and through their undersigned counsel, hereby move the Court to enter a consent judgment in favor of Plaintiffs and against Defendant, RG Steel Holdings, LLC (the “Defendant”). In support of thereof, Plaintiffs state as follows:

1. Plaintiffs filed this action to collect withdrawal liability from Defendant under the Employee Retirement Income Security Act of 1974 (“ERISA”) as amended by the Multiemployer Pension Plan Amendments Act of 1980, 29 U.S.C. § 1001 *et seq.*
  2. Plaintiffs and Defendant have agreed to the entry of a consent judgment against Defendant and in favor of Plaintiffs.
  3. In light of the foregoing, Plaintiffs request that this Court enter a consent judgment against Defendant.
  4. Prior to the filing of this motion, Plaintiffs’ counsel contacted Defendant’s counsel, who stated that she agreed to the granting of this motion.

5. A copy of the proposed Consent Judgment is attached hereto as Exhibit 1 for the Court's review and will also be submitted electronically to the Court's e-mail address for proposed orders.

**WHEREFORE**, Plaintiffs respectfully request that the Court enter the Consent Judgment attached hereto as Exhibit 1.

Respectfully submitted,

/s/ Anthony E. Napoli  
Anthony E. Napoli  
Attorney for Central States, Southeast  
and Southwest Areas Pension Fund  
9377 W. Higgins Road, 10th Floor  
Rosemont, Illinois 60018-4938  
(847) 518-9800, Ext. 3702  
ARDC # 06210910  
tnapoli@centralstatesfunds.org

October 18, 2013